

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

E.I. du PONT de NEMOURS AND
COMPANY,

Plaintiff,

v.

KOLON INDUSTRIES, INC.,

Defendant.

Civil Action No. 3:09CV00058

**PLAINTIFF E.I. du PONT de NEMOURS AND COMPANY’S MOTION TO STRIKE
ERRATA SHEETS OF CERTAIN KOLON INDUSTRIES, INC.’S DEPONENTS**

Plaintiff E.I. du Pont de Nemours and Company (“DuPont”), through counsel, respectfully moves this Court for an order to strike the errata sheets of certain Kolon Industries, Inc.’s (“Kolon”) deponents which make substantial changes to their original deposition testimony. Specifically, the following errata sheets should be stricken: (1) Su-Yong Noh’s July 27-29, 2010 30(b)(6) deposition errata sheets; (2) Jong Tae Park’s July 28-30, 2010 30(b)(6) deposition errata sheets; (3) In-Sik Han’s October 28, 2010 errata sheets; (4) Oh-Hwan Kim’s October 19, 2010 and October 21, 2010 deposition errata sheets; and (5) Young-Soo Seo’s October 26, 2010 deposition errata sheets.

For the reasons set forth herein and in the accompanying Memorandum of Law, DuPont respectfully requests that the Court grant this Motion to Strike Errata Sheets of Certain Kolon Deponents and provide DuPont with such other relief as the Court deems just.

February 15, 2011

Respectfully submitted,

E. I. du Pont de Nemours and Company

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of February, 2011, I served the foregoing via the Court's CM/ECF System and by hand on:

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